

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

ALAN CAMPBELL, individually and  
as Mitchell Campbell's grandfather,  
and his capacity as the Personal  
Representative for the Estate of  
Mitchell Campbell; DIANE  
CAMPBELL, individually and as  
Mitchell Campbell's grandmother; and  
MC, the biological minor daughter of  
Mitchell Campbell, by and through a  
GAL to be named,

Plaintiffs,

v.

OUR LADY OF LOURDES  
HOSPITAL AT PASCO, d/b/a Lourdes  
Medical Center; KEVIN S. OWENS,  
M.D., in his professional and  
individual capacity and his spouse,  
Jane Doe Owens; CITY OF PASCO;  
CITY OF PASCO POLICE  
DEPARTMENT; CITY OF PASCO  
CHIEF OF POLICE ROBERT  
METZGER, in his official capacity as  
well as his individual capacity, and his  
spouse Jane Doe Metzger, individually;  
CITY OF PASCO POLICE OFFICER  
ROBERT HARRIS, in his official  
capacity as well as his individual  
capacity, and his spouse Jane Doe

NO: 4:16-CV-5048-RMP

PROTECTIVE ORDER

Harris, individually; CITY OF PASCO OFFICER MATT GRIFFIN, in his official capacity as well as his individual capacity, and his spouse Jane Doe Griffin; FRANKLIN COUNTY; FRANKLIN COUNTY SHERIFF RICHARD LATHIM, in his official capacity as well as his individual capacity, and his spouse Jane Doe Lathim; CAPTAIN RICK LONG, in his official capacity as well as his individual capacity, and his spouse Jane Doe Long; FRANKLIN COUNTY CORRECTIONS OFFICER JESSICA BROOKS, in her official capacity as well as her individual capacity, and her spouse John Doe Brooks; FRANKLIN COUNTY CORRECTIONS OFFICER YVETTE WILSON, in her official capacity as well as her individual capacity, and her spouse John Doe Wilson; and DOES 1-12,

Defendants.

On September 15, 2016, the parties, by and through their attorneys, agreed and stipulated pursuant to FRCP 29, to a protective order regarding certain “Protected Documents.” Accordingly, **IT IS HEREBY ORDERED** that the parties’ Stipulated Motion for Protective Order, **ECF No. 29**, is **GRANTED**.

The following provisions constitute the Protective Order regarding release of protected documents in this matter:

1           1.     The parties shall not disclose or share any part of the “Protected  
2 Documents” described below or any information gleaned from said documents with  
3 any person except as expressly provided herein.

4           2.     The Protected Documents covered by this Stipulation and the  
5 subsequent Order of the court are described as follows: All files, personnel or  
6 otherwise, maintained by the City of Pasco Police Department for officers Robert  
7 Harris and Matt Griffin.

8           3.     Prior to any disclosure of Protected Documents as described in this  
9 Order the parties shall obtain from each proposed recipient of the Protected  
10 Documents their signature on a copy of the Protective Order that states that the  
11 recipient has received a copy of the Protective Order regarding the Protected  
12 Documents and agrees to be bound by such order. By signing a copy of the  
13 Protective Order the recipient agrees that he or she has read the Order, represents  
14 that he or she is a person permitted to have access to information from the Protected  
15 Documents and agrees that he or she will make no further disclosure of the  
16 information received, will personally protect the confidentiality of all copies and will  
17 either return them to the producing parties’ attorneys at the conclusion of this case,  
18 or will at that time personally destroy them and upon request from the producing  
19 parties provide a sworn affidavit that he or she has done so.

1           4.     Subject to the terms of this Order, the parties may allow inspection of  
2 Protected Documents or discuss the contents of Protected Documents or information  
3 therefrom with only the following categories of persons and no other:

4               a.     Duly licensed and professional experts, consultants or  
5 investigators retained to assist in evaluation, preparation or testimony in this case;

6               b.     Any court personnel, court reporter, mediator, judge and or jury  
7 in this case;

8               c.     Any person identified as having authored or previously received  
9 the material.

10          5.     If it becomes necessary for any party to submit a Protected Document  
11 to the court, that party shall inform the producing party with sufficient time prior to  
12 the filing of the Protected Document such that a motion to seal the Protected  
13 Document can be noted prior to filing. A motion to seal will not be granted unless  
14 the motion and supporting documents establish compelling reasons to seal.

15          6.     The parties shall use the Protected Documents or information obtained  
16 from them only for the purpose of prosecuting this litigation.

17          7.     At the time of exchange of exhibit lists, the parties shall list in the  
18 exhibit list for their case in chief any Protected Document they intend to use at the  
19 time of trial by designating the exhibit as a "PROTECTED DOCUMENT" in capital  
20 letters. Any other party may request an in camera review of the exhibit and make  
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1 the appropriate motion for the handling of the document at trial in accordance with  
2 the Jury Trial Scheduling Order.

3 8. Nothing in this Protective Order shall limit any producing party's use of  
4 its own documents or prevent any producing party from disclosing its confidential  
5 information to any person.

6 9. The Court retains jurisdiction to make any amendments, modifications  
7 or additions to the Protective Order as it deems appropriate.

8 10. The parties, by stipulation, may add additional documents to be covered  
9 by this Order.

10 This District Court Clerk is directed to enter this Order and provide copies to  
11 counsel.

12 **DATED** this 15th day of September 2016.

13  
14 *s/ Rosanna Malouf Peterson*  
15 ROSANNA MALOUF PETERSON  
16 United States District Judge  
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